From:
 Manny Jacobowitz

 To:
 WAWDdb NewCasesSea

 Cc:
 Stephen Lagos; Velvel Freedman

Subject: Motion to Compel Compliance with Foreign Subpoena, Kleiman v. Wright

Date: Monday, April 6, 2020 9:58:51 PM

Attachments: 2020.04.06 -- Motion to Compel Nguyen to Comply.pdf

Nguyen Proposed Order efj04062020.pdf

2020.04.06 -- Freedman Decl for Motion to Compel Nguyen to Comply.pdf

EX 1 - [DE 277] 2019.08.27 -- Order on Pltfs" Mot to Compel (DE 210) 4836-9927-8008 v.1.pdf

EX 2 - [DE 373] 2020.01.10 -- Order Sustaining in Part & Overruled in Part Re Def"s Objection to Magistrate

Order Deeming Certain Facts Established 4834-4722-6552 v.1.pdf

EX 3 - [DE 382] 2020.01.16 -- Order re Plts" Motion for 90-Day Extension of Pretrial Deadlines 4846-5129-9505

v.1.pdf

EX 4 - Kleiman - Jimmy Nguyen Subpoena (Production) (FINAL).pdf EX 5 - Kleiman - Jimmy Nguyen Subpoena (Deposition) (FINAL).pdf

EX 6 - 2020.03.06 -- Declaration of Attempted Service of Process on Jimmy Nguyen.pdf EX 7 - [DE 411] 2020.03.02 -- Joint Discovery Status Report 4841-1818-4120 v.1.pdf

Ex 8 - 2020.03.10 -- Email to Nguyen Serving Subpoena.pdf

EX 9 - [DE 436] 2020.03.24 -- Pltf"s Expedited Mtn for EOT for Expert-Related DLs and Expert Depos 4833-1648-

7608 v.1.pdf

EX 10 - [DE 441] 2020.03.26 -- Order Amending Scheduling Order 4835-1787-9736 v.1.pdf

EX 11 - Certified Mail Receipt.pdf

EX 12 - 2020.03.29 Tweet to Nguyen Serving Subpoena.pdf

EX 13 - Twitter Analytics.pdf
EX 14 - Nguyen Twitter Feed.pdf

Hello,

Pursuant to the instructions on the Court's website, I ask the Clerk to open a miscellaneous case based on the attached documents. Please contact me for payment of the filing fee and any other documents or information that may be needed.

Please be aware, we erroneously began to file this matter, earlier this evening, as a new civil case. A civil case number was automatically assigned, 2:20-cv-00528, but as no filing fee was paid, I hope that was a non-event. If there's anything we need to do to cancel that new-case filing, though, let me know, and sorry for the inconvenience.

Attachments:

Motion to Compel Proposed Order

Declaration of Velvel Freedman

Exhibits 1-14

Manny Jacobowitz

CLOUTIER ARNOLD JACOBOWITZ PLLC

Manny@CAllawvers.com

T: 206.866.3230 | C: 206.769.3759 2701 First Avenue, Suite 200

Seattle, WA 98121 www.CAllawyers.com

CLIENT CONNECTED. BUSINESS SAVVY. IP SMART. TM

NOTICE: This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies. IRS 230 DISCLOSURE - you should be aware that this communication is not intended or written by the sender to be used, and it cannot be used, by any recipient for the purpose of avoiding penalties

that may be imposed on the recipient under United States federal tax laws